

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION101 CENTRE PLAZA DRIVE  
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32098

October 23, 1996

Mr. George Mileskiy  
Director of Environment  
JOHNSON CONTROLS, INC.  
49200 Halyard Drive  
Plymouth, Michigan 48170SAN GABRIEL VALLEY CLEANUP PROGRAM - REPORT REVIEW, JOHNSON  
CONTROLS FACILITY, 315 SOUTH SEVENTH AVENUE, CITY OF INDUSTRY,  
CALIFORNIA (FILE NO. 102.0058)

We are in receipt of the "Soil Gas Survey Report", dated March 31, 1993, submitted by your consultant, TRIAD GEOTECHNICAL CONSULTANTS, INC. The subject report details the results of an initial soil gas survey at the subject site. This submission is in general compliance with requirements in our letter of July 2, 1992. Upon review of the subject report, we have the following comments:

1. A total of seventeen (17), mostly shallow, soil vapor samples were collected from soil vapor probes installed to maximum depths ranging from 5' to 15' below ground surface (bgs) in several potential source areas during this phase of assessment.
2. Maximum volatile organic compounds (VOCs) concentrations detected were 47.1 µg/l of PCE, 30.6 µg/l of 1,1,1-TCA, 10.6 µg/l of 1,1-DCA, and 0.6 µg/l of TCE detected in samples collected from vapor probe SG-1, installed near the former compressor room area. Deeper samples contained only traces of VOCs.
3. The following reported QC/QA data from the subject soil gas survey are not in accordance with the requirements as stated in our "REQUIREMENTS FOR ACTIVE SOIL GAS INVESTIGATION":
  - ♦ For the laboratory control samples, the percent (%) Difference exceeds the required 15% on target compounds detected such as 1,1-DCE (45%), PCE (19%), and ethylbenzene (167%).
  - ♦ For the initial three point calibrations, dichlorodifluoromethane, vinyl chloride, chloroethane, and trichlorofluoromethane were not included.

The above QA/QC deficiencies compromise the results of the soil gas survey and reduce the level of confidence.

Based on the results of the assessment work and previously acquired

data at the subject site, Board staff have determined that additional assessment is required to resolve QA/QC deficiencies noted in the soil gas investigation report, and to complete the evaluation of the vadose zone at this site. Listed below are the minimum requirements that Board staff believe are necessary to accomplish the objectives of the San Gabriel Valley Cleanup Program:

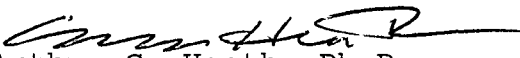
1. A limited soil gas survey must be performed to confirm previous assessment work and evaluate unassessed potential VOC sources at the subject facility. The work must be performed in accordance with the attached "Requirements for Active Soil Gas Investigation".
  - ◆ Shallow (5' bgs) and/or deep (to 15' bgs) soil gas probes must be located in the following areas:
    1. One 15' deep vapor probe in the outlet and inlet of the clarifier.
    2. Re-sample soil vapor probes SG-1, 3, 4, 7, 10, and 15 located in the eastern area of the facility, outside the building. Also install two 5' deep vapor probes at the former hazardous chemical storage area.
    3. Three 10' deep vapor probes in the former compressor room.
    4. Three 10' and one 20' deep vapor probes in the room adjacent to the compressor room.
    5. Three 10' deep vapor probe at each floor drain and two 15' deep vapor probes at a sump located southeast of the former grinding room.
    6. One 10' deep vapor probe at a sump located inside the southwestern section of the building.
  - ◆ Soil vapor samples must be analyzed for halogenated and aromatic VOCs in accordance with EPA methods 8010/8020.
  - ◆ A contingency plan must be implemented for the collection of additional soil vapor samples to define the horizontal and vertical limits of soil contamination where initial samples contained elevated concentrations of VOCs.

Board staff are prepared to meet with you and your consultant to design an assessment program that will produce the required results in a cost effective manner.

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**Three copies** of the required work plan for a limited soil gas survey must be received by **November 23, 1996**. If you have any questions, please contact Julio C. Lara at (213) 266-7541 and address all correspondence to his attention.

Your cooperation in completing the required assessment work at this facility is appreciated.

  
Arthur G. Heath, Ph.D.  
Environmental Specialist IV

cc: ✓ Janet Whitlock, U.S. EPA, Region IX, San Francisco  
Dennis Dickerson, Cal-EPA, DTSC, Region 3  
Carol Williams, San Gabriel Valley Watermaster  
Linda Casey, Majestic Realty, Property owner

Enclosures